

1 Tina Wolfson, SBN 174806  
twolfson@ahdootwolfson.com  
2 Robert Ahdoot, SBN 172098  
rahdoot@ahdootwolfson.com  
3 AHDOOT & WOLFSON, P.C.  
4 10850 Wilshire Boulevard, Suite 370  
5 Los Angeles, California 90024  
Telephone: (310) 474-9111  
6 Facsimile: (310) 474-8585

7 Michael F. Ram, SBN 104805  
mram@rocklawcal.com  
8 J. Kirk Boyd, SBN 122759  
kboyd@rocklawcal.com  
9 RAM, OLSON, CEREGHINO & KOPCZYNSKI  
10 555 Montgomery Street, Suite 820  
11 San Francisco, California 94111  
12 Telephone: (415) 433-4949  
13 Facsimile: (415) 433-7311  
Attorneys for Plaintiff,  
14 RANDY BOYSEN

15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**

17  
18 RANDY BOYSEN, an individual, on his  
own behalf and on behalf of all others  
19 similarly situated,

20 Plaintiff,

21 v.

22 WALGREEN CO., an Illinois  
Corporation d.b.a. WALGREENS; and  
23 DOES 1-10, inclusive,

24 Defendants.

CASE NO. 11-cv-06262-SI

CLASS ACTION

**STIPULATION AND [~~PROPOSED~~]  
ORDER MODIFYING HEARING  
DATE AND BRIEFING DEADLINES  
ON DEFENDANT'S MOTION TO  
DISMISS AND MOTION TO STAY**

Current Hearing Date: June 15, 2012  
Proposed Hearing Date: July 20, 2012  
Time: 9:00 a.m.  
Courtroom 10, 19th Floor  
The Honorable Susan Illston

Pursuant to Local Rules 6-2 and 7-12, and for the reasons set forth in the accompanying Declaration of Tina Wolfson, Plaintiff Randy Boysen ("Plaintiff") and Defendant Walgreen Co. ("Defendant") hereby stipulate, and request that the Court issue the [Proposed] Order below, to modify the hearing date and the briefing schedule on Defendant's Motion to Dismiss (Docket No. 14) and Motion to Stay (Docket No. 18) (collectively, the "Motions"), as follows:

- Plaintiff's Oppositions to the Motions, currently due on May 21 (14 days after service and filing per Local Rule 7-3), shall be due on **June 4, 2012**.
- Defendant's Replies in Support of the Motions, currently due May 28 (7 days after the Oppositions are filed and served), shall be due on **June 18, 2012**.
- The currently noticed hearing date on both Motions, of June 15, 2012, shall be extended to **July 20, 2012**.

Dated: May 17, 2012

**AHDOOT & WOLFSON, PC**

/s/ Tina Wolfson  
Tina Wolfson, Esq.  
10850 Wilshire Blvd., Suite 370  
Los Angeles, California 90024  
Tel: 310-474-9111; Fax: 310-474-8585

Dated: May 17, 2012

**RAM, OLSON, CEREGHINO &  
KOPCZYNSKI LLP**

/s/ Michael F. Ram  
Michael F. Ram, Esq.  
555 Montgomery Street, Suite 820  
San Francisco, California 94111  
Tel: (415) 433-4949; Fax: (415) 433-7311

*Attorneys for Plaintiff, Randy Boysen*

1 Dated: May 17, 2012


MORRISON & FOERSTER

2  
3 By: /s/ James Schurz  
4 James M. Schurz  
5 425 Market Street  
6 San Francisco, California 94105  
7 T: (415) 268-6449; F: (415) 268-7522  
8 Email: jschurz@mofo.com

9 Attorneys for Defendant,  
10 WALGREEN CO.

11  
12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13  
14 5/18/12

15 By:   
16 The Honorable Susan Illston  
17 U.S. District Court Judge  
18  
19  
20  
21  
22

23 **ATTESTATION OF FILER**

24 Pursuant to N.D. Cal. General Order No. 45 § X.B, the undersigned attests that  
25 each of the above-named signatories concur in the filing of this Joint Motion.  
26

27 By: /s/ Tina Wolfson  
28 Tina Wolfson

1 Tina Wolfson, SBN 174806  
2 twolfson@ahdootwolfson.com  
3 Robert Ahdoot, SBN 172098  
4 rahdoot@ahdootwolfson.com  
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9 Facsimile: (310) 474-8585

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14 RANDY BOYSEN

15 **UNITED STATES DISTRICT COURT**  
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22 WALGREEN CO., an Illinois  
23 Corporation d.b.a. WALGREENS; and  
24 DOES 1-10, inclusive,

25 Defendants.

CASE NO. 11-cv-06262-SI

CLASS ACTION

**DECLARATION OF TINA  
WOLFSON IN SUPPORT OF  
STIPULATION AND [PROPOSED]  
ORDER MODIFYING HEARING  
DATE AND BRIEFING DEADLINES  
ON DEFENDANT'S MOTION TO  
DISMISS AND MOTION TO STAY**

Hearing Date: June 15th, 2012

Time: 9:00 a.m.

Courtroom 10, 19th Floor

The Honorable Susan Illston

1 I, Tina Wolfson, declare as follows:

2 1. I am an attorney duly licensed to practice in all courts in the State of  
3 California and the District of Columbia. Pursuant to Local Rule 6-2, I submit this  
4 declaration in support of the concurrently filed Stipulation and [Proposed] Order  
5 Modifying Hearing Date and Briefing Deadlines on Defendant's Motion to Dismiss  
6 and Motion to Stay (the "Stipulation") in the above-captioned case. The matters stated  
7 herein are true of my own knowledge or, where indicated, I am informed and believe  
8 that they are true. If called upon as a witness, I could and would competently testify to  
9 these facts.

10 2. My firm's and my co-counsel's firm's extremely busy work schedules at  
11 this time, and the substantial work required to oppose Defendant's Motion to Dismiss  
12 and Motion to Stay, make the originally scheduled briefing schedule and hearing date  
13 on these motions unmanageable for Plaintiffs' counsel. Defendant's counsel,  
14 meanwhile, is unavailable for another hearing date until July 20, 2012. Counsel for all  
15 parties have met and conferred on these scheduling issues, and agree that this proposed  
16 modification is fair and just under the circumstances.

17 3. There has been one previous time modification in this Action, by  
18 stipulation, which Extended the Deadlines in the Court's Order Setting Initial Case  
19 Management Conference and ADR Deadlines. (Docket No. 8.)

20 4. The extension requested in the current Stipulation will have no effect on  
21 the schedule for this case, other than requested briefing extension itself.

22  
23 I declare under the penalty of perjury on the 17th day of May, 2012, that the  
24 foregoing is true and correct.

25  
26   
27 Tina Wolfson  
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